

RJG/MGP

5409-26690

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOBBI ANDERSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FRANCIS ALFARO and	)	
SCHNEIDER NATIONAL, INC.,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

NOW COMES Defendant, SCHNEIDER NATIONAL, INC., a Wisconsin corporation (hereinafter “Defendant”), by its attorneys, Robert J. Golden, Michael G. Patrizio, and Dowd & Dowd, Ltd., and pursuant to 28 U.S.C. 1332, 1441, and 1446, removes this lawsuit from the Circuit Court of the Twelfth Judicial Circuit, Will County, Illinois, to the United States District Court for the Northern District of Illinois, Eastern Division. In support of removal, Defendant states as follows:

1. The ground for removal is subject matter jurisdiction based on diversity of citizenship as established in 28 U.S.C. 1332.
2. Plaintiff, BOBBI ANDERSON (hereinafter “Plaintiff”), is a citizen of the State of Illinois. See, Illinois Traffic Crash Report, attached as Exhibit A.
3. Defendant, SCHNEIDER NATIONAL INC., is a Wisconsin corporation and has its principal place of business at 3101 South Packerland Drive, Green Bay, Wisconsin 54303. (See, Form 10-K Schneider National, Inc., Annual Report, attached as Exhibit B.) Defendant therefore is a citizen of the State of Wisconsin.

4. Defendant, FRANCIS ALFARO, has not yet been served. At the time of the incident, ALFARO was a citizen of the State of Florida. (See, Illinois Traffic Crash Report, Exhibit A.) Upon information and belief, he has since re-located to the State of Texas.

5. For these reasons, complete diversity of citizenship exists among all Parties.

6. This lawsuit arises from a motor vehicle accident that occurred in the City of Elwood, Will County, Illinois. Plaintiff alleges she was injured when a vehicle operated by ALFARO made a left turn in front of Plaintiff's vehicle, causing her serious injury.

7. On February 8, 2021, Plaintiff filed a Complaint at Law in the Circuit Court of Will County, styled *Bobbi Anderson, Plaintiff, v. Francis Alfaro and Schneider National, Inc., Defendants*, No. 2021 L 111. See, Exhibit C.

8. The Complaint contains a Rule 222(b) Affidavit, in which Plaintiff alleges her claimed damages exceed \$50,000. In addition, the known amount of medical bills and treatment rendered to date indicate Plaintiff's alleged damages exceed the jurisdictional threshold necessary for the exercise of diversity jurisdiction.

9. For these reasons, Defendant believes in good faith that the amount in controversy exceeds the jurisdictional minimum of \$75,000 necessary for jurisdiction.

10. Defendant was served with the Summons and Complaint on March 31, 2021, through its registered agent. See, Service of Process Summary Transmittal Form, attached as Exhibit D.

11. Accordingly, this Notice of Removal was filed within 30 days of "the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based." 28 U.S.C. 1446(b).

12. As required by 28 U.S.C. 1446(d), Defendant will promptly serve upon Plaintiff's counsel, and file with the Clerk of the Circuit Court of Will County, a true and correct copy of this Notice.

13. By removing this action, Defendant does not waive any defenses available to it.

14. If any question arises as to the propriety of the removal, Defendant requests the opportunity to present a brief and argument in support of its position that this case is removable.

15. This Petition is signed in compliance with Rule 11 of the Federal Rules of Civil Procedure.

WHEREFORE, Defendant, SCHNEIDER NATIONAL, INC., a Wisconsin corporation, prays that this Honorable Court retain jurisdiction of this matter pursuant to 28 U.S.C. 1332, 1441 and 1446.

Respectfully submitted,

By: s/ Robert J. Golden

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